

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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LEEZA GARG,

Plaintiff,

-against-

TEXTILES FROM EUROPE, INC.,
Individually and d/b/a VICTORIA
CLASSICS, TOBY COHEN Individually
and JOSEPH COHEN, Individually,

Defendants.
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Case No: 2:15-CV-07296 (ES) (MAH)

Hon. Michael A. Hammer

JOINT DISCOVERY PLAN

1. Set forth a factual description of the case. Include the causes of action and affirmative defenses asserted.

Plaintiff alleges that she was discriminated against by her former employer on the basis of her pregnancy in violation of Title VII, as amended by the Pregnancy Discrimination Act ("PDA"), and the New Jersey Law Against Discrimination ("NJLAD"). Plaintiff was hired by Defendants on or about September 4, 2014. At the time she was hired, Plaintiff was three months pregnant but did not disclose her pregnancy to her employer nor was Plaintiff visibly showing at the time. Plaintiff alleges that Defendants reduced her work responsibilities and ultimately terminated her on November 17, 2014 upon learning that Plaintiff was pregnant.

Defendants deny all allegations of wrongdoing and submit that all employment actions taken with respect to Plaintiff were based on legitimate business reasons.

2. Have settlement discussions taken place?

The parties have not engaged in any settlement discussions at this time. The parties believe that additional discovery is needed before effective settlement discussions can take place.

3. Mandatory Disclosures

The parties have exchanged the information required by Fed. R. Civ. P. 26(a)(1).

4. Describe any discovery conducted other than the above disclosures.

Plaintiff has provided documents in her possession relating to her employment as well as documents related to her mitigation efforts. The parties have also exchanged their submissions to the EEOC.

5. Describe any Motions any party may seek to make prior to the completion of discovery.

The parties do not currently anticipate any motions prior to the completion of discovery. Any motions to amend or add parties will be filed by March 31, 2016.

6. The parties propose the following:

- (a) Discovery is needed on the following subjects: Plaintiff's performance, Defendants' knowledge of Plaintiff's pregnancy, Plaintiff's emotional distress and mitigation efforts;**
- (b) Should discovery be conducted in phases: The parties propose that expert discovery take place following any dispositive motions;**
- (c) Number of Interrogatories: 25;**
- (d) Number of Depositions: Plaintiff 10; Defendants 2;**
- (e) Plaintiff's expert report due: TBD by the Court following dispositive motions;**
- (f) Defendant's expert report due: TBD by the Court following dispositive motions;**
- (g) Motions to Amend or to Add Parties to be filed by: March 31, 2016;**
- (h) Dispositive Motions to be served within 60 days of completion of fact discovery;**
- (i) Factual discovery to be completed by: June 29, 2016;**
- (j) Expert discovery to be completed by: TBD by the Court following dispositive motions;**
- (k) Set forth any special discovery mechanism or procedure requested, including data preservation orders or protective orders: The parties anticipate the need for a protective order for confidential information;**
- (l) A pretrial conference may take place on: TBD by the Court;**
- (m) Trial by jury or non-jury Trial? Trial by Jury;**
- (n) Trial date: TBD by the Court.**

7. Do you anticipate any discovery problems?

The parties do not anticipate any discovery problems at this time.

8. Do you anticipate any special discovery needs?

The parties do not currently anticipate any special discovery needs.

9. State whether this case is appropriate for voluntary arbitration, mediation, appointment of a special master or other special procedure.

The parties may wish to attempt mediation following paper discovery and/or after several key depositions.

10. Is this case appropriate for bifurcation? No.

11. We do not consent to trial being conducted by a Magistrate Judge.

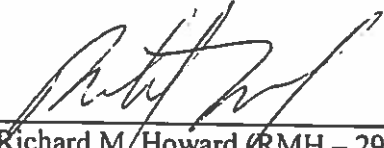
Dated: Mineola, New York
January 8, 2016

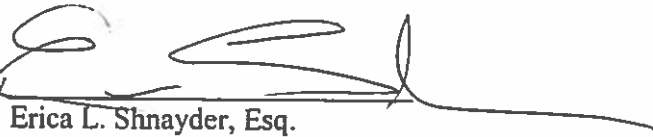
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